

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 Act and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 (the “Act”). It sets out the steps taken by TXM Healthcare Ltd to prevent modern slavery and human trafficking in its business and supply chain.

TXM Healthcare Ltd fully supports the Government’s objectives to eradicate modern slavery and human trafficking and recognises the significant role we can play in both combatting it and supporting victims. We are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

We recognise that being in the employment agencies and employment businesses industry for Healthcare Recruitment we are exposed to risks relating to the potential violation of human rights in areas including modern slavery and human trafficking. We are conscious that such risks can arise in certain areas of the sector, in particular financially for candidates. We are committed to monitoring such risks in our business and our wider supply chain and to mitigating them.

## Steps taken to date include:

- Our Modern Slavery policy is reviewed annually to ensure it is still fit for purpose and shared across the business.
- Our Modern Slavery policy was issued to all new employees, who have acknowledged and confirmed they have read and understood.
- All new employees were required to complete Modern Slavery training within one month of joining the Company and existing employees complete refresher Modern Slavery training bi-annually.
- All employees have been advised on how they can report any concerns they may have associated with Modern Slavery.
- All employees have been reminded of the UK confidential whistleblowing helpline if they wish to make an anonymous report and posters are displayed in our offices, or staff can contact our safeguarding lead who will treat any whistleblowing report with the strictest confidence and without fear of reprisals.
- All suppliers agree to comply with our Supplier Code of Conduct as part of their contractual relationship with the Company and these companies are vetted to ensure they are compliant with all relevant legislation.
- We take a risk-based approach towards our suppliers and undertake audits of those suppliers where we consider the exposure to be greatest. No significant problems have been indicated within our supply.
- All our branches received at least one compliance audit during which pre-employment checks, including eligibility to work, references, qualifications, and proof of national insurance numbers, were audited and deemed compliant.
- We conduct internal Financial Pay Audits performing random checks within our businesses to identify where agency workers may be sharing bank accounts, addresses, or telephone numbers as this can be an indication of illegal or unethical behaviour. Where these are shared, we approach the individuals involved to ensure this is voluntary, for example where couples share a bank.

## Organisation Chart:

### Managing Director

Danny Limby

### Commercial Director

Matthew Maple

### Quality & Operations Director

Rhian Nicholas-Bean

### Directors Recruitment Workforce

Michael Hollis

Omar Hassine

### Clinical Board

Responsible Officer

Clinical Nurse Manager

Safeguarding Lead

### Compliance Manager

Charlotte Barnes

## POLICIES RELATING TO MODERN SLAVERY:

- Modern Slavery
- Equality, Diversity, and Inclusion
- Anti-Bribery & Corruption
- Corporate & Social Responsibility
- Whistleblowing Policy
- Complaints Policy

## PEOPLE

We promote a workplace environment that is fair, open, and respectful and one that protects the rights and dignity of all employees. We operate people practices, contracts of employment, and collective agreements that are lawful and aligned with our Code and values.

- We confirm the identities of all new employees, temporary workers, and contractors and their right to work in the United Kingdom, and pay all our employees above the National Living Wage
- Our Respect at Work, Grievance, and Voicing your Concerns for Staff policies additionally give a platform for our employees to raise concerns about poor working practices.
- We use social media to raise awareness and invest in training to ensure front-line staff are aware of and able to respond to incidents of modern slavery.

## WHISTLEBLOWING

Our whistleblowing policy sets out our commitment to ensure people are free to question things and raise anything they are concerned about and specifically modern slavery and human trafficking. We encourage people to speak up by raising matters with Ciaran Maynes, TXM Healthcare, Safeguarding Lead, and Registered Nurse Manager, or the UK Modern Slavery Helpline on 08000 121 700 or fill out an online form at <https://www.modernslaveryhelpline.org/>.

## PROCUREMENT AND OUR SUPPLY CHAIN

- Our current due diligence process includes a modern slavery assessment.
- When procuring goods and services, we additionally apply specific Terms and Conditions that require suppliers to comply with relevant legislation.
- Our onboarding process requires us to vet in accordance with relevant legislation and regulations, with assurance required through evidence that the supply chain does not promote or take part in Modern Slavery activities.

## REVIEW OF EFFECTIVENESS

We intend to take further steps to identify, assess, and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in our supply chains.

In 2024/25, our anti-slavery program will also:

- continue to support all staff to understand and respond to modern slavery and human trafficking, and the impact that each, and every individual working in the healthcare, recruitment, and employment sector can have in keeping present and potential future victims of modern slavery and human trafficking safe.

- ensure that staff have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will help staff develop the skills to support individuals who come into contact with health services. TXM Academy Hub provides modules on this.
- review our safeguarding policies and training programmes to ensure that Modern Slavery and human trafficking reflect potential requirements in pending reforms relating to the pre-criminal needs of people involved in human trafficking and modern slavery.
- undertake a risk assessment on transparency in supply chain including an overview of products, services, and suppliers procured.

Signed:



Daniel Limby  
Managing Director  
TXM Healthcare Ltd  
2/5/2024